

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

JESSE PAUL SKINNER, and X  
all similarly situated  
Plaintiffs x

V. X CIVIL ACTION No. 9:18-CV-139

BRYAN COLLIER X DEMAND FOR JURY TRIAL

MATT GROSS

BILLY LEWIS X

BRUCE JOHNSON

KENNETH HUTTO X

JAMES KENT

BLAKE NORMAN X

JEQUILLE REED

GEORGE JANSKY, JR. X

KRYSTEL HOHENBRINK

SAMUEL DOMINEY X

CORA SIMS

KENNETH RAGLAND X

JUSTIN MCKIGHT

ALVIN PERRY X

JOHN STUBBLEFIELD, and

TEXAS DEPARTMENT OF CRIMINAL X

JUSTICE

Defendants X

X

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
DEC 26 2018

BY  
DEPUTY

PLAINTIFF'S MOTION FOR LEAVE TO FILE  
AN AMENDED COMPLAINT

Plaintiff, Jesse Paul Skinner, pro se, pursuant to Rule 15(a) and 19(a) Federal Rule of Civil Procedures, requests leave to file an Amended Complaint adding parties.

1. The Plaintiff in his original complaint did not name these defendants to the complaint due to the delay by the Defendants in resolving the institutions grievance procedure. See attached (Step-two grievance No. 2018143333, marked as (Exhibit #1))

against Defendants Kenneth Ragland.Lt,Justin McKight.Sgt,Alvin Perry.Sgt,  
and Defendant John Stubblefield.Captain in grievance No. 2018095001.

2. The Plaintiff's complaint in paragraph-section (I) Retaliation,  
reflect the actions of Defendants Kenneth Ragland,Justin McKight,Alvin  
Perry,all sued in their Individual Capacity.

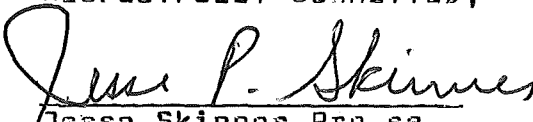
3. The Plaintiff's complaint in paragraphs-sections (I) and (J)  
Retaliation and Equal Protection Violations reflect the actions of  
Defendant John Stubblefield,sued in his Official Capacity.

4. The Plaintiff make the **Demand For Jury Trial** at this time  
in amending the complaint.


5. This Honorable Court should grant leave freely to amend a  
complaint. Foman V. Davis, 371 U.S. 178,182 (1962).

WHEREFORE, Plaintiff prays that this Honorable Court grant his  
requests to Amend his Complaint to add Defendants and request for  
Jury Demand.

RESPECTFULLY SUBMITTED,

  
Jesse Skinner, Pro se  
TDCJ #599362/Eastham  
2665 Prison Rd.#1  
Lovelady,Texas 75851

28 USCA § 1746,  
42 I declare under penalth of purjury that the  
foregoing are true and correct to my persona knowledge.  
Executed on this 17th of December 2018.

  
Jesse P. Skinner



Texas Department of Criminal Justice  
**STEP 2**  
**OFFENDER**  
**GRIEVANCE FORM**

Offender Name: MR. Jesse P. Skinner TDCJ# 599362  
Unit: Eastham-09 Housing Assignment: ~~B-23~~ P-312  
Unit where incident occurred: Eastham09  
Appealing Grievance No. 2018143333/Code 815

OFFICE USE ONLY	
Grievance #:	2018143333
UGI Recd Date:	JUN 19 2018
HQ Recd Date:	JUN 22 2018
Date Due:	7.29
Grievance Code:	815
Investigator ID#:	IT364
Extension Date:	09.09

*You must attach the completed Step 1 Grievance that has been signed by the Warden for your Step 2 appeal to be accepted. You may not appeal to Step 2 with a Step 1 that has been returned unprocessed.*

**Give reason for appeal (Be Specific).** I am dissatisfied with the response at Step 1 because...

I am dissatisfied with the response of the step one grievance because:

1. The Warden failed to file this complaint with the (TDCJ-CID) Risk Management pertaining to my complaint of unsafe act by the parties mentioned in this grievance.
2. This grievance is not a complaint against the conditions of confinement as documented under the grievance Code 815. This is a (Safety Issue-526) and a (Americans with Disabilities Act-004) claim that all parties failed to make or provide the appropriate accommodations for individuals with lifting, walking, standing, bending, performing manual tasks, working, and with respiratory disabilities on not being able to carry their property to the (Shake-down) area resulted in me re-injuring my left-shoulder and cervical spine area on May 23, 2018. In violation of (TDCJ-CID) AD.10.20 and ED. 10.61 Safety Policies, and 42 U.S.C.A. 12102(1), (2) Americans with Disabilities Act, cruel and unusual punishment.
3. I am incorporating my step one grievance complaint in to this step two appeal. In I am requesting that a further inquisition be conducted in to my complaint.

Attachment-Step One Grievance.

cc/jps

I-128 Front (Revised 11-2010)

YOUR SIGNATURE IS REQUIRED ON BACK OF THIS FORM

(OVER)

Appendix G

Mr. Jesse P. Skinner  
TDCJ# 599362/Eastham  
2665 Prison Rd.#1  
Lovelady, Texas 75851

December 17, 2018

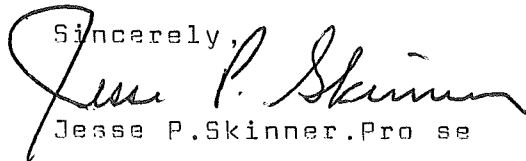
Office of the Clerk  
United States District Court  
of Texas Eastern District  
104 North Third Street  
Lufkin, Texas 75901

RE: Jesse P. Skinner V. Bryan Collier, et al Case No. 9:18-00139.  
Plaintiff's Motion To Amend Complaint:

Dear Clerk,

Please find enclosed original and one copy of Plaintiff's  
Motion To Amend Complaint to add Parties and Request for  
Jury Demand. File all material with the Court for consideration.

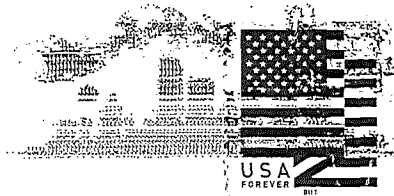
I thank you for your time and assistance with this matter.  
I await your response. I Remain.

Sincerely,  
  
Jesse P. Skinner. Pro se

enclosure/file

Mr. Jesse P. Skinner  
TDCJ# 599362/Eastham  
2665 Prison Rd.#1  
Lovelady, Texas 75851

NORTH TEXAS TX PSDC  
DALLAS TX 750  
DALLAS TEXAS 75201



U.S. 440  
P.C. 7

Clerk of the Court  
United States district Court  
Eastern district of Texas  
104 North Third Street  
Lufkin, Texas 75901

75901-000105

